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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12
13 **INTUITIVE SURGICAL**
14 **OPERATIONS, INC.,**

15 Plaintiff,
16 vs.

17 **JONATHAN LAM,**

18 Defendant.

19 Case No. 3:24-cv-7427

20 Case Assigned to:
Hon. James Donato

21 **JOINT STIPULATION RE TRO**
22 **HEARING**

1 Plaintiff INTUITIVE SURGICAL OPERATIONS, INC. (“Plaintiff”) and De-
2 fendant JONATHAN LAM (“Defendant”), by and through their counsel,
3 hereby stipulate and agree as follows:

- 4 1. WHEREAS, Plaintiff filed the Complaint in this matter on October 24,
5 2024;
- 6 2. WHEREAS, Plaintiff filed a Motion for a Temporary Restraining Order
7 and Expedited Discovery (the “TRO Motion”) on October 25, 2024,
8 and noticed such motion for hearing on October 28, 2024. The hear-
9 ing was re-set for November 7, 2024 following reassignment of this
10 matter to this Court;
- 11 3. WHEREAS, Counsel for Defendant is unavailable on November 7; and
- 12 4. WHEREAS, the Parties have met and conferred and wish to continue
13 to TRO hearing, and have been advised by Court staff that December 5,
14 2024 is desirable for the Court;

16 THEREFORE, the Parties stipulate and agree as follows:

- 17 1. Hearing on Plaintiff’s Temporary Restraining Order shall be continued
18 to December 5, 2024;
- 19 2. Defendant’s response to Plaintiff’s Motion for a Temporary Restraining
20 Order shall be due at 9:00 a.m. on December 2, 2024; and
- 21 3. Mr. Lam agrees that until such time as an Order issued on Plaintiff’s
22 TRO Motion, neither he nor any of his agents, accomplices, aiders and
23 abettors, co-conspirators, or others working in concert with him,
24 whether directly or indirectly, shall solicit, access, review, use, disclose,
25 leverage, and/or interact in any manner with any Intuitive property,
26 any non-public Intuitive information, and/or any communication, doc-
27 ument, work product, derivative work, or other material containing,
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1 reflecting, or comprising non-public Intuitive information, except that
2 Mr. Lam's counsel of record shall be permitted to access, review, and
3 use such information solely in defending the above-captioned litigation
4 between Mr. Lam and Intuitive.

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7 Dated: November 5, 2024

KING & SIEGEL LLP

9 By: /s/ Robert J. King
10 Robert J. King
11 Julian King
12 Attorneys for Defendant

13
14 Dated: November 5, 2024

BRAUNHAGEY & BORDEN LLP

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16 By: /s/ Doug Tilley
17 Doug Tilley
18 Attorneys for Plaintiff

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20 PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.

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22 Dated: _____

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24 HON. JAMES DONATO
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26 UNITED STATES DISTRICT JUDGE
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